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Admitted to Practice Law
in the State of New York

July 3, 2025

VIA ECF

Hon. Gary R. Brown, USDJ
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, NY 11717

Re: **MOTION FOR EXTENSION OF TIME TO FILE REPLY MEMORANDUM IN
SUPPORT OF DEFENDANTS' MOTION FOR A NEW TRIAL AND OTHER
RELIEF, NUNC PRO TUNC (DE 91)**
Barahona et al. v. Paradise Tree Service & Landscape Corp. and William Nieto
Case No.: 2:21-cv-05400 (GRB)(LGD)

Dear Judge Brown:

Regarding the above matter, this office represents the Defendants and this morning July 3, 2025, has filed a Reply Memorandum in further support of defendants' motion for a new trial and other relief. I am respectfully requesting that the Court grant me an extension of time to file this reply, nunc pro tunc. The Court had initially granted me a deadline of July 2, 2025 to file this reply on June 26, 2025. As you may recall, on June 25, 2025, I filed a motion for an extension to file this reply prior to the Plaintiffs filing their opposition and even though the opposition was due that day. The court's records indicate plaintiffs filed their opposition after 6pm on June 25, 2025 but it was not docketed until June 26, 2025. I am respectfully requesting that the Court accept my reply and extend my time to file it nunc pro tunc, as I filed it before 9am this morning.

Thank you, Your Honor, for your attention to this matter.

Respectfully submitted,

Glenn J. Ingoglia

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**c.c.: VIA ECF
Steven J. Moser, Esq.
Moser Law Firm, P.C.
Attorney for Plaintiffs**